

**EXHIBIT****13**

21-cv-00260-PB

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

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SECURITIES AND EXCHANGE	:	
COMMISSION,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	Civil Action No. 1:21-cv-00260-PB
	:	
LBRY, INC.,	:	
	:	
Defendant.	:	
-----	X	

**DEFENDANT LBRY, INC.'S RESPONSES AND OBJECTIONS  
TO PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S  
FIRST SET OF REQUESTS FOR ADMISSIONS**

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure (“Federal Rules”) and the Local Rules for the United States District Court for the District of New Hampshire (“Local Rules”), Defendant LBRY, Inc. (“LBRY”), by its attorneys, hereby responds and objects as follows to Plaintiff Securities and Exchange Commission’s (“SEC’s”) First Set of Requests for Admissions to LBRY, including the Definitions and Instructions thereto, dated February 2, 2022 (the “Requests,” and each, a “Request”). These responses are based on LBRY’s current knowledge, and LBRY reserves the right to supplement or amend each of these responses and objections as discovery progresses.

**GENERAL OBJECTIONS**

Unless otherwise indicated, the following general objections apply to each numbered Request as if each was specifically set forth therein, in addition to any specific objection included therein. The assertion of the same, similar or additional objections or the provision of partial answers in the specific responses does not waive any of the general objections.

**RESPONSE TO REQUEST NUMBER 7:** The response and objections to Request No. 4 are incorporated by reference as if fully set forth herein.

**REQUEST NUMBER 8:** As of January 1, 2021, the number of transactions of LBC as payment for video content using LBRY's Applications on the LBRY Network represented less than 1% of all LBC transactions on the LBRY Blockchain.

**RESPONSE TO REQUEST NUMBER 8:** The response and objections to Request No. 4 are incorporated by reference as if fully set forth herein.

**REQUEST NUMBER 9:** As of February 2, 2022, the number of transactions of LBC as payment for video content using LBRY's Applications on the LBRY Network represented less than 0.5% of all LBC transactions on the LBRY Blockchain.

**RESPONSE TO REQUEST NUMBER 9:** The response and objections to Request No. 4 are incorporated by reference as if fully set forth herein.

**REQUEST NUMBER 10:** Since July 2016, LBRY has used its servers to host or mirror video content published to the LBRY Network.

**RESPONSE TO REQUEST NUMBER 10:** LBRY incorporates its general objections as if restated herein. Subject to and without waiving the foregoing objections, LBRY admits that it has used its servers, which constitute less than 1% of the nodes in the LBRY Network, to seed content to the LBRY Network.

**REQUEST NUMBER 11:** LBRY has hosted on its servers more than 50% of the video content available through its applications LBRY.tv and Odysee.

**RESPONSE TO REQUEST NUMBER 11:** LBRY incorporates its general objections as if restated herein. LBRY further objects to this Request as vague and ambiguous. LBRY further objects to this Request as overly broad and unduly burdensome to the extent it requires LBRY to conduct calculations or analyses concerning data that is equally accessible to the Commission. LBRY also objects to this Request as beyond the scope of Federal Rule of Civil Procedure 36 to the extent it improperly seeks expert testimony or is more appropriately the subject of expert